

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

No.: 23 Cr. 118-3 (AT)

v.

YANPING WANG,

*Defendant.*

**DEFENDANT'S NOTICE OF PRE-TRIAL MOTIONS**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law, Declaration of Brendan F. Quigley and exhibits thereto, Defendant Yanping Wang will move this Court before the Honorable Analisa Torres, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York, 10007, on a date and time to be determined, for orders (i) suppressing evidence, (ii) suppressing statements, (iii) directing the government to provide a bill of particulars, (iv) severing her trial and (v) for dismissing the counts against her in the S1 Indictment.

Dated: December 15, 2023

BAKER BOTTS L.L.P.

By: /s/ Brendan F. Quigley

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